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From: Richard Charter [mailto:waterway@monitor.net]

Sent: Thursday, February 17, 2005 4:53 PM

To: MLPAComments@resources.ca.gov

Subject: MLPAComments: urgent: Comments on MLPA "Study Region" selection

Importance: High

RE: Comments on MLPA "Study Region" selection

From: Richard Charter, Environmental Defense

to: MLPAComments@resources.ca.gov

These comments, submitted on behalf of the 400,000 members of Environmental Defense, request that the Blue Ribbon Panel adopt a broad enough "Study Region" to enable the needed degree of flexibility in its pending selection of draft alternatives for networks of Marine Protected Areas. This flexibility at the outset is critical, so that enough different spatial alternatives can be developed to allow the Panel to overcome now-unforeseen constraints likely to be presented by site-specific environmental factors, excessive public controversy due to space-use issues, or significant socioeconomic conflicts that may well tend to preclude adequate MPA siting on one or more sections of coastline. We would therefore recommend that Bodega Bay to Pt. Conception would be an appropriate "Study Region", and one that meets virtually all of the Panel's criteria under consideration at this time.

As the BRTF's MLPA workshop on February 16 in Santa Cruz once again made abundantly clear, localized public concern, misapprehension, and opposition in reaction to even preliminary MPA proposals in some regions of the Central Coast can be quite strong. Were the Blue Ribbon Panel to prematurely preclude their own, and their Science Team's, ability to engage in an objective evaluation of an adequate geographic range of potential MPA network sites, the Panel itself may find that it has curtailed its own near-term options to the point of missing important available candidate sites in need of appropriate and timely protection.

The selection of an initial "Study Region" from Bodega Head to Pt. Conception also makes sense from the standpoint of allowing room for "replicates", a key element of the MLPA law and necessary in the event that an oil spill or other future disaster wipes out one or more MPA sites. Major shoreline promontories, or points, are one of the primary demarcations of areas encompassing similar biological communities along the California coast. Anchoring the "Study Region" between the major headland at Bodega Bay, and the similar and more pronounced biogeographic break at Pt. Conception, is in keeping with this premise. Major oceanic upwelling cells and the circular current motion of gyres associated with these two prominent points also provide compelling evidence that logical zones of demarcation are found at these places. This would logically place the existing well-studied Area of Special Biological Significance (ASBS) at Bodega Head at the northern end of the "Study Area", and the nearshore closed aerospace security area at Vandenberg Air Force Base, as well as the existing marine reserves and marine parks within the Channel Islands National Marine Sanctuary, at the southern terminus of the

"Study Region". Between the University of California's Bodega Marine Laboratory and the University of California's marine researchers at UC Santa Barbara, the "Study Area" would thus encompass a number of the most prestigious marine science research institutions in the world. Availability of data within this entire "Study Area", which has been mapped in detailed Geographic Information System (GIS) format by the NOAA Coastal Data Center for the National Marine Sanctuary Management Plan Review Process, is technically excellent and as comprehensive as any coastal mapping completed to date anywhere in US waters.

The Bodega Head to Pt. Conception "Study Region" also presents a logical geopolitical northern limit of the "Study Region" which is coherent with the northern boundaries of the Gulf of the Farallones and Cordell Bank National Marine Sanctuaries. In addition, the Sonoma-Marin county line boundary lies near Bodega Head. Both public and private partner agencies abound within this region, including the Sanctuary Advisory Councils and staff of the Monterey Bay, Gulf of the Farallones, and Cordell Bank National Marine Sanctuaries, the National Park Service, GGNRA, California State Parks, researchers from the Monterey Bay Aquarium, MBARI, Hopkins Marine Station, Steinhart Aquarium, and the Bodega Marine Lab. The prior incarnation of the California Department of Fish and Game's Central Coast Marine Life Protection Act Stakeholder Working Group had already made important progress in evaluating many of the prospective MPA sites within much of this "Study Area" as well.

The origins of the oceanic and meteorological processes that drive the primary upwelling cell which transports nutrient-rich deep ocean waters upward, bathing the Cordell Bank with a lush foodsource, and flowing throughout the proposed "Study Area", should be included in the Panel's configuration. To do otherwise would deny at the outset the necessity of protecting the "upstream" source of the web of life on the Central California coastline.

Thank you for this opportunity to provide these comments on the selection of a "Study Area" by the Blue Ribbon Panel.

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